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Attorneys for Defendants
INSURANCE CENTERS OF AMERICA, INC.; ICA INSURANCE ALLIANCE/SAA
INSURANCE AGENCY, AND PHIL FOX

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIFFANY PLUMMER,)	CASE NO. 3:18-cv-07781-RS
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING DEADLINES FOR
vs.)	EXPERT DISCLOSURE AND
)	DISCOVERY AND PRETRIAL
INSURANCE CENTERS OF AMERICA,)	MOTIONS AS MODIFIED BY THE
INC.; ICA INSURANCE ALLIANCE/SSA)	COURT
INSURANCE AGENCY; PHIL FOX, an)	
individual; and DOES 1-50, inclusive)	
)	[Civil L.R. 6-2, 7-12]
Defendant.)	
)	
)	
)	

1 Plaintiff TIFFANY PLUMMER (“Plaintiff”) and Defendants INSURANCE CENTERS
2 OF AMERICA, INC., ICA INSURANCE ALLIANCE/SAA INSURANCE AGENCY, and
3 PHIL FOX (collectively, “Defendants”) hereby stipulate and respectfully request that:

- 4 1. The deadline for parties to designate experts in accordance with Federal Rule of
5 Civil Procedure 26(a)(2) be continued from January 30, 2020 to April 10, 2020;
- 6 2. The deadline for parties to designate their supplemental and rebuttal experts in
7 accordance with Federal Rule of Civil Procedure 26(a)(2) be continued from
8 February 28, 2020 to May 8, 2020;
- 9 3. The deadline for parties to complete all discovery of expert witnesses in
10 accordance with Federal Rule of Civil Procedure 26(b)(4) be continued from
11 March 30, 2020 to May 29, 2020; and
- 12 4. The last day to hear pretrial motions be continued from May 7, 2020 to June 17,
13 2020.

14 The parties believe that good cause exists to continue these deadlines based on the
15 following:

16 On November 28, 2018 Plaintiff filed this action against Defendants in the Superior
17 Court of California for the County of San Mateo, alleging violations of California’s Fair
18 Employment and Housing Act (FEHA) and the California Family Rights Act (CFRA), and
19 wrongful termination in violation of public policy.

20 On December 28, 2018, Defendants removed this action to this Court.

21 On April 12, 2019, the Court filed a Case Management Scheduling Order that included
22 deadlines for the disclosure and discovery of expert witnesses and a deadline for pretrial motions
23 to be heard. Dkt. 12.

24 On December 12, 2019, the Court filed a Further Case Management Scheduling Order
25 that included revised deadlines for the disclosure and discovery of expert witnesses, and a
26 revised deadline for pretrial motions to be heard. Dkt. 16.

27 The parties are scheduled to participate in a mediation of this dispute on March 12, 2020,
28 with mediator Patricia Gillette, Esq. at JAMS.

1 In order to minimize the parties' resources, and judicial resources to the extent the Court
2 would need to become involved in any disputes related to expert discovery, the parties seek to
3 continue expert disclosures and discovery until after the March 12, 2020 mediation, and to allow
4 additional time for potential pre-trial motions to be heard, without continuing the final pre-trial
5 conference or the trial date.

6 Therefore, the parties ask the Court to adopt this stipulated schedule for these dates, with
7 no modification to any other deadlines in this action:

8 Event	Current Scheduled Deadline (Dkt. 16)	Proposed Stipulated Deadline (post-March 2020 mediation)
9		
10 Deadline for parties to designate experts in 11 accordance with Federal Rule of Civil Procedure 26(a)(2)	January 30, 2020	April 10, 2020
12 Deadline for parties to designate their supplemental 13 and rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2)	February 28, 2020	May 8, 2020
14 Deadline for parties to complete all discovery of 15 expert witnesses in accordance with Federal Rule of Civil Procedure 26(b)(4)	March 30, 2020	May 29, 2020
16 Last day to hear pretrial motions	May 7, 2020	June 17, 2020

17
18 Respectfully submitted,

19 Dated: January 14, 2020

GORDON REES SCULLY MANSUKHANI, LLP

20
21 By: _____

Michael D. Bruno
Seth Weisburst
Attorneys for Defendants
INSURANCE CENTERS OF AMERICA,
INC.; ICA INSURANCE ALLIANCES/SSA
INSURANCE AGENCY; and PHIL FOX

22
23
24 Dated: January 14, 2020

LAW OFFICES OF DANIEL FEDER

25
26 By: _____

Daniel Feder
Attorneys for Plaintiff
TIFFANY PLUMMER

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FILER’S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I attest that I received concurrence of the signatories in the filing of this document.

Seth Weisburst

